

1 JOHN C. KIRKE, #175055  
johnk@donahue.com  
2 WILLIAM R. HILL, #114954  
rock@donahue.com  
3 DONAHUE GALLAGHER WOODS LLP  
Attorneys at Law  
4 1999 Harrison Street, 25th Floor  
Oakland, California 94612-3520  
5 P.O. Box 12979  
Oakland, California 94604-2979  
6 Telephone: (510) 451-0544  
Facsimile: (510) 832-1486  
7

8 Attorneys for Defendant  
9 MARIN MOUNTAIN BIKES, INC.

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DIAMOND STATE INSURANCE  
COMPANY, an Indiana corporation,

Plaintiff,

v.

MARIN MOUNTAIN BIKES, INC., a  
California corporation; and ATB SALES  
LIMITED, a private limited liability  
company in the United Kingdom,

Defendants.

CASE NO. 4:11-cv-05193-CW

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO  
COMPLAINT**

**[LOCAL RULE 6-1]**

1 Plaintiff Diamond State Insurance Company ("Plaintiff") and Defendant Marin Mountain  
2 Bikes, Inc. ("Defendant") stipulate as follows:

3 WHEREAS, the Complaint in this action was filed on October 24, 2011, and an answer or  
4 other responsive pleading would be due on December 15, 2011;

5 WHEREAS, there have been no previous requests to the Court for an extension and the  
6 stipulated extension of time will not impact any deadlines set by the Court or pursuant to Rule 26;

7 WHEREAS, the parties below stipulate that the deadline for Defendant to answer or  
8 otherwise respond to the Complaint is December 30, 2011.

9 IT SO STIPULATED.

10 Dated: December \_\_, 2011 DONAHUE GALLAGHER WOODS LLP

12 By: /s/ John C. Kirke

13 John C. Kirke  
14 Attorneys for Defendant  
15 MARIN MOUNTAIN BIKES, INC.

16 Dated: December 13, 2011 NIELSEN HALEY & ABBOT LLP

17 By: /s/ Jennifer S. Cohn 

18 Jennifer S. Cohn, Esq.  
19 Attorneys for Plaintiff  
20 DIAMOND STATE INSURANCE COMPANY

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Dated: 12/14/2011

  
23 Hon. Claudia Wilken  
24 United States District Court Judge